

# Public consultation questionnaire informing the Skills Portability Initiative

Fields marked with \* are mandatory.

## Introduction

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The European Union is working on an initiative to improve the understanding, digitalisation and recognition of qualifications and skills across Europe, regardless of how or where they were acquired (at work, in a training centre, at university, in another country, etc.).

Take part in this survey, share your experiences and opinion, and help the EU shape this initiative.

## Target audience

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This consultation seeks input from across the EU on how skills and qualifications are recognised and understood across borders, including in border regions where people may live in one EU country but work in a neighbouring one. It is open to individuals aged 16 and above. We are particularly interested in hearing from **working-age people** and from **employers or recruiters** who assess and evaluate candidates' skills and qualifications, whether they were obtained within the EU or in non-EU countries. We also welcome contributions from other organisations involved in or affected by mobility and skills recognition, such as public authorities, competent authorities responsible for recognition, research institutions and civil society organisations, to ensure a broad and inclusive understanding of the challenges and opportunities for skills portability in the EU. We invite these organisations to complete this questionnaire from the perspective of their area of expertise and representation, as well as their experience as employers.

## Why are we consulting?

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The Skills Portability Initiative aims to make it easier for individuals and employers to identify, showcase, understand, trust and use skills and qualifications across the EU – whether obtained within the EU or in non-EU countries. This is key to improving the EU's competitiveness, both within its internal market and in the global race for talent. This public consultation seeks to collect evidence, experiences, and views from individuals and organisations on the challenges they face in having qualifications or skills recognised or assessed across borders, the impact of these challenges, and the possible solutions and improvements that could make recognition and skills portability simpler, faster and more reliable, including through the use of verifiable digital credentials and EU-wide tools. The results will support the European Commission's work in

identifying potential policy actions and legislative options to improve the portability of skills and qualifications in the EU, while ensuring added value at European, national and local levels. This initiative has a strong focus on simplification and does not impose any new obligations on employers or workers.

For this survey, the following definitions of qualifications and skills apply:

**Qualifications:** Official certificates (like a university diploma or vocational certificate) provided by a competent body that prove someone has achieved learning corresponding to a given standard. A qualification can be a legal entitlement to practice a trade.

**Skills:** What a person can do because of their knowledge or experience (such as use software, repair machines, care for patients, etc.). Skills can be gained e.g. while working, through volunteering or while studying and training, with or without receiving a formal certificate.

**Recognition of qualifications:** The process by which a relevant authority (such as a public body or a higher education or training institution) formally accepts a qualification obtained in another country as equivalent /comparable to its own, for the purpose of work, study or access to a regulated profession[1].

**Validation of skills:** The process by which relevant authorities, such as public bodies or education institutions, identify, document, assess and certify skills that a person has, including those acquired through non-formal and informal learning (for example, while working or in a short training course)[2].

[1] [https://commission.europa.eu/education/skills-and-qualifications/recognition-your-qualifications\\_en](https://commission.europa.eu/education/skills-and-qualifications/recognition-your-qualifications_en)

[2] <https://europass.europa.eu/en/validation-non-formal-and-informal-learning>

Additional definitions are available for reference. Feel free to consult them or skip directly to the consultation below.

Please click here to display the additional definitions

## About you

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### \* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian

- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

\* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

Other, please specify:

Representation of professional organisations

\* First name

Sarada

\* Surname

DAS

\* Email (this won't be published)

sarada.das@cpme.eu

\* Organisation name

*255 character(s) maximum*

Standing Committee of European Doctors (CPME)

\* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

9276943405-41

\* Country of origin

Please add your country of origin, or that of your organisation.

*This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.*

- Afghanistan
- Djibouti
- Libya
- Saint Martin
- Åland Islands
- Dominica
- Liechtenstein
- Saint Pierre and Miquelon

- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom

- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena  
Ascension and  
Tristan da Cunha
- Saint Kitts and  
Nevis
- Saint Lucia
- United States
- United States  
Minor Outlying  
Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and  
Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

### \* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

**Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

**Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

\*Which of these sectors are you related to?

- Aerospace and defence
- Agri-food
- Construction
- Cultural and creative industries
- Digital
- Electronics
- Energy-intensive industries
- Energy - renewables
- Health
- Mobility – transport – automotive
- Proximity and social economy
- Retail
- Textile
- Tourism
- Public sector

- I am not related to any specific sector
- Other (please specify)

\* To what extent are you involved in recruitment or hiring processes in your organisation?

- Directly involved (e.g. HR, management)
- Indirectly involved (e.g. providing input on candidate profiles or selection)
- Not involved
- Don't know / Not applicable

## Problems/Challenges

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To what extent do you consider the following challenges related to skills portability in the EU to be a problem?

	Not a problem at all	A small problem	A moderate problem	A big problem	A very big problem
* Employers find it more difficult to understand and trust qualifications obtained in a country other than their own.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Employers in other countries find it difficult to understand what skills a person has acquired through work experience.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The certificates (e.g. micro-credentials) that a person receives after following a short training course have less value for employers who are unfamiliar with the course provider and the training conditions.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Qualifications are rarely issued as verifiable digital credentials.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Qualifications issued as verifiable digital credentials in one country cannot be easily shared with employers or authorities in other EU countries.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Recognition processes for accessing a regulated profession in another country are often lengthy, complex and costly.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* People who have studied and acquired skills outside the EU do not have a uniform and simple way to get their qualifications recognised and their skills validated to access the EU labour market.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Employers in the European Union who want to recruit people from outside of the EU struggle to understand what people can do and/or need to wait for their qualifications to be recognised.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

\* Do you think there are other issues that make it harder for people to have their skills and qualifications understood, recognised and valued in another country?

- Yes  
 No

Please elaborate:

If the question is understood to refer to include applicants holding a third country qualification, there may be issues concerning authenticity, validity of qualifications as well as differences in curricula between issuing institutions.

\* Have you had any personal experiences with any of these challenges, for example, when applying for jobs in a different country, recruiting people from another country or dealing with the recognition of qualifications or validation of skills?

- Yes  
 No

Please tell us about your experience:

The Standing Committee of European Doctors (CPME) represents national medical associations across Europe, covering more than 1.7 million doctors in 36 countries.

## EU tools

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\* With which of the following EU tools supporting transparency, comparability and recognition of skills and qualifications are you familiar? (Please select all that apply)

- European Qualifications Framework (EQF)

- Europass Framework
- European Skills, Competences, Qualifications and Occupations (ESCO)
- The Professional Qualifications Directive (Directive 2005/36/EC)
- European Quality Assurance in Vocational Education and Training (EQAVET)
- Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)
- European Credit Transfer and Accumulation System (ECTS)
- Database of External Quality Assurance Results (DEQAR)
- National Academic Recognition Information Centres in the European Union (NARIC)
- European Digital Credentials for Learning (EDC)
- Single Digital Gateway and Once-Only technical System (OOTS)
- European Learning Model (ELM)
- [EU Digital Identity Wallet](#)
- Databases of qualifications from the National Qualifications Frameworks
- Diploma Supplement and Certificate Supplement

Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate.

CPME underlines that the Directive on the Mutual Recognition of Professional Qualifications (Directive 2005/36/EC) is functioning well, and our members do not report significant problems. We wish to underline that the minimum training requirements may not be diluted, confirming that they represent minimum requirements and in light of increasing demands on medical education curricula, Member States may increase the duration. At the same time, the integrity of basic medical education and medical specialist training, and continuing professional development must be maintained to ensure high quality up-to-date qualifications. Any challenges observed in practice do not arise from the Directive itself, but from inconsistent or incorrect application and implementation at national level.

## EU action

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To what extent do you think EU-level action is necessary for the following objectives?

	Very necessary	Somewhat necessary	Not very necessary	Not at all necessary	I don't know/ Not sure

* To guarantee that qualifications are transparent and evenly understood across the EU.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* To facilitate a common system of certification, so that knowledge and skills acquired through short training courses (e.g. micro-credentials) are understood throughout the EU.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* To guarantee that people can get a certificate that demonstrates what they can do, and that this validation of skills certificate is issued in a common format throughout the EU.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* To enhance the digitalisation and transnational sharing of qualifications in the EU.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* To enhance the digitalisation and transnational sharing of skills credentials in the EU (for example, the certificate you get after an official authority has validated your skills, or a diploma).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* To simplify, modernise and speed up administrative procedures for the recognition of qualifications across the EU.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* To simplify the way in which people who have acquired qualifications or skills outside the EU can get them recognised in the EU so that they can access the EU labour market.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please elaborate

CPME recognises the potential value of micro-credentials in supporting continuing professional development (CPD) and lifelong learning for doctors. However micro-credentials cannot replace comprehensive accredited medical education and training. For regulated professions such as medicine, micro-credentials must not be used for initial qualification, professional recognition, or scope-of-practice extension and must remain strictly complementary within national CPD frameworks under the oversight of competent authorities. Regarding a common format for skills validation, this should be concentrated only on skills of high importance. European Doctors are supportive of digitalisation and secure cross-border exchange of formal qualifications to improve transparency and administrative efficiency in the EU. Any changes to recognition procedures must fully preserve patient safety, uphold minimum training requirements as set out in Directive 2005/36/EC. Any modernisation of recognition procedures must preserve robust verification and the role of competent authorities.

\* In your view, how important is it for your sector or your country to attract skilled non-EU nationals to address current and future labour market needs?

- Very important
- Important
- Somewhat important
- Not important
- Not sure/ No opinion

\* In your view, how important is it in your sector or country to equip workers and employers with reliable tools to identify and demonstrate a person's skills, regardless of how they acquired them (through work or study, etc.)?

- Very important
- Important
- Somewhat important
- Not important
- Not sure / No opinion

Please provide further details

Medicine requires highly educated and highly trained professionals. Skills and competences are inseparable from formal education, structured postgraduate training, and regulated clinical experience. The medical profession cannot rely on informal skill validation mechanisms to establish core competence. Unlike other sectors, medicine does not allow for partial or modular recognition of core clinical responsibilities as this would undermine patient safety as well as public confidence.

Should new tools/policies/rules be introduced at EU level? Please provide as much detail as possible, including the needs these initiatives would address.

CPME underlines that Directive 2005/36/EC provides a robust and effective framework for ensuring clear, verifiable, and comparable minimum training requirements. The existing legislation ensures mutual trust between EU Member States and continue to enable the safe recognition of medical qualifications. Several National Medical Associations (NMAs) have also requested that the Commission consider providing clearer guidance to Member States on the minimum requirements for duration of practical and theoretical training. Topics such as those mentioned above on minimum training duration and others could be addressed in the form of an Interpretative Communication for legal guidance by the European Commission. Any new policies must remain embedded within the existing regulatory framework of Directive 2005/36/EC and avoid creating parallel systems which weaken qualification requirements or blur professional responsibilities.

## Possible EU-level solutions

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\* Imagine a system where qualifications and training or skills certificates across the EU are issued as verifiable and transparent digital credentials that can be shared, understood and processed across borders.

Individuals could share their qualifications with employers or authorities in another country, and these organisations could check their authenticity quickly and securely.

Do you think such a system would lead to cost savings or reductions in administrative burden for any of the groups below? (select all that apply)

- Individuals / Job seekers
- Employers
- Education or training providers
- Recognition bodies
- Public administrations
- Other (please specify below)

Other (please specify):

\* What concerns, if any, would you have about EU-level digital credentials for qualifications? (Select all that apply)

- Data privacy or security issues
- Not being legally valid in all countries
- Technical complexity or lack of compatibility between systems
- Risk of excluding people with low digital skills or poor internet access

- Costs of adopting or using the system
- Doubts about who issues or verifies the credentials
- Dependence on specific platforms or providers
- None of the above
- Other (please specify)

\* If EU-wide digital credentials for qualifications and skills were available, how likely would you be to use them and/or accept them if someone were to share them with you?

- Very likely
- Somewhat likely
- Somewhat unlikely
- Very unlikely
- Don't know

\* If the EU could improve or create new online/digital ways for people to show and share their qualifications, which changes do you think would help the most? (Choose up to three)

*between 1 and 3 choices*

- Providing a database of qualification standards that can be consulted by all.
- Ensuring that digital credentials work everywhere in the EU.
- Linking digital credentials to a single secure app or 'digital wallet' for all documents.
- Uploading verifiable digital credentials in an EU Digital Identity Wallet.
- Ensuring easy access to verifiable digital credentials.
- Making it easy for schools and training providers to issue verifiable digital credentials.
- Providing a simple service for employers to check verifiable digital credentials
- Offering clear guidance and help for people using verifiable digital credentials.
- Other (please specify below)

\* What type of digital tools could be most useful to improve administrative procedures for recognition applications? (Please select up to three)

*between 1 and 3 choices*

- Simple online portals where applicants can submit, track, and manage their applications in one place.
- Automated document-verification tools (e.g. authenticity checks, completeness checks, fraud detection).
- Automated translation of documents in other languages
- Digital pre-screening tools to assess whether recognition is needed and what documents are required.
- AI-assisted assessment tools to support the analysis of qualifications and identify training gaps.
- Automated notification and deadline-alert systems to prevent delays and improve communication.
- Other (please specify)

Other (please specify):

Several tools could be useful such as digital pre-screening tools to assess whether recognition is needed; automatic translation of documents in other languages; automated document verification tools including authenticity checks and fraud detection. However, it is important that these tools assist in the work of competent authorities while decision making must not be substituted.

## Additional comments

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If you wish to add further information- within the scope of this consultation- please do so here

CPME underlines that the persistent shortage of skilled healthcare professionals across Europe reflect a longstanding structural imbalance between recruitment and attrition, further compounded by a sustained rise in demand for healthcare services. In this context, measures aimed at facilitating the recognition of foreign qualifications, while relevant for support professional mobility, do not sustainably increase overall workforce capacity and therefore cannot address the underlying shortage of skilled healthcare professionals. International recruitment is increasingly being used to compensate for domestic shortages of skilled healthcare professionals, despite its unsustainable and ethically problematic nature. A durable solution requires long-term investment by the EU and its Member States in the education, training, retention, and working conditions of a highly educated, domestically trained healthcare workforce in sufficient number, rather than reliance on cross-border mobility as a substitute for comprehensive workforce planning and retention strategies.

## Participation in focus group

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\* Several focus groups will be organised as part of this initiative's consultation process, and we would welcome your participation. Would you like to be invited to one of these focus groups?

- Yes
- No
- Maybe, please send me additional information

## **Contact**

[Contact Form](#)